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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) NO. CR 11-541 EMC

Plaintiff,

V.

RONALD GLENN JONES.

Defendant.

1

UNITED STATES OF AMERICA.

Plaintiff

V

RONALD GLENN JONES

Defendant

STIP. AND [PROPOSED] ORDER RESETTING FIRST APPEARANCE AND EXCLUDING TIME

Case No. CR 11-541 EMC

Case No. CR 17-344 EMC

STIPULATION

IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

1. The parties were scheduled to appear before the Court on August 2, 2017 at 2:30 p.m. for a first appearance. On August 2, 2017, prior to 2:30 p.m., Assistant United States Attorney Karen Kreuzkamp, counsel for the Government, and Erik Levin, counsel for defendant Ronald Glenn Jones, learned that Mr. Jones, who is in custody, was not medically cleared for transport by the United States Marshal Service to the Court. The parties therefore request that the first appearance be reset for September 27, 2017 at 2:30 p.m.

2. The parties respectfully submit and agree that the period from August 2, 2017 through and including September 27, 2017 should be excluded from the otherwise applicable Speedy Trial Act computation because the continuance is necessary for continuity of defense counsel and effective preparation of counsel, taking into account the exercise of due diligence. Specifically, the time requested for exclusion will allow for continuity of counsel for the defendant, as his counsel is scheduled to travel for part of August, and will allow defense counsel time to review the discovery.

IT IS SO STIPULATED.

DATED: August 2, 2017

BRIAN J. STRETCH
United States Attorney

DATED: August 2, 2017

/s/
KAREN KREUZKAMP
Assistant United States Attorney

/s/
ERIK LEVIN
Counsel for Defendant
Ronald Glenn Jones

[PROPOSED] ORDER

Based upon the above-described Stipulation, THE COURT FINDS THAT the ends of justice served by granting a continuance August 2, 2017 through and including September 27, 2017 outweigh the best interest of the public and the defendant in a speedy trial, and that failure to grant such a continuance would unreasonably deny the defendant continuity of counsel and would deny defense

1 counsel the reasonable time necessary for effective preparation, taking into account the exercise of due
2 diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

3 Accordingly, THE COURT ORDERS THAT:

4 1. The parties shall appear before the Court on September 27, 2017 at 2:30 p.m. for a status
5 conference.

6 2. The period from August 2, 2017 through and including September 27, 2017 is excluded
7 from the otherwise applicable Speedy Trial Act computation, pursuant to 18 U.S.C. § 3161(h)(7)(A) &
8 (B)(iv).

9 IT IS SO ORDERED.

10 DATED: 8/2/17

